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ACTION ITEM STATUS

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EG&G ROCKY FLATS, INC ROCKY FLATS PLANT PO BOX 46; GOLDEN COLC ADO 80402 0464 (303, 536 7000

REVISED RISK ASSESSMENT SCHEDULE - SGS-389-94

July 1, 1994

Jessie M Roberson Acting Assistant Manager for Environmental Restoration DOE/RFFO

Attn Norma Castañeda



94-RF-07089



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Schedule impacts for Operable Units (OUs) affected by the Human Health Risk Assessment (HHRA) stop work order were provided in a EG&G, Rocky Flats, Inc., April 10, 1994, letter to you. However, new direction was provided during the May 10 meeting with EG&G, Department of Energy (DOE), Environmental Protection Agency (EPA), and Colorado Department of Health (CDH). Attached please find the revised risk assessment schedules for OUs 2, 3, 5, and 6. The following general and OU-specific schedule assumptions were used by OUs 2, 3, 5 and 6 to develop these new schedules Deviations from these assumptions will result in the need to modify the deliverable dates.

# General Assumptions

Professional judgement within the CDH conservation screen and the Contamiriants of Concern Technical Memorandum (COC TM) will only be applied to the higher risk contaminants. Higher risk contaminants are defined by being significant within the concentration toxicity screen or by significantly contributing to a ratio of ≥1 in the CDH conservative screen. All other chemicals, metals, and radionuclides will be addressed in the Remedial Investigation (RI) Report

The COC TM and the CDH conservative screen will be performed with the draft Programmatic Preliminary Remediation Goals (PPRGs) before the approval process is completed. These PPRGs are based on EPA default values with no site-specific factors applied.

These schedules do not contain Human Health Risk Assessment (HHRA) information pertaining to template use and development. Template impacts will be assessed when the template is approved for use

The assessment of "Hot Spots" will not be included in the HHRA

The number of source areas proposed for each OU is provided in the OU-specific assumptions listed below. These source area numbers are the ones that will be used in the CDH conservative screen and risk assessment.

Jessie M Roberson July 1, 1994 94-RF-07089 Page 2

TMs will be reviewed/approved by the agencies in a time frame consistent with the new schedule

## Data Aggregation Assumptions

"Source" areas and "Areas of Concern" will be defined per the presentations given on June 3, 1994, and June 7, 1994, by DOE, EPA, and CDH for the purpose of data aggregation. The CDH conservative screen will have a formal review and approval process associated with it

"Areas of Concern" to be used in the Baseline Risk Assessment will be reviewed and approved as part of the letter report containing the CDH conservative screen

An addendum to the exposure scenario TM will be required to delineate which exposure scenarios will be assessed at each "Area of Concern "

The RFI/RI Reports will include sections in the risk assessment chapters to address each source area and/or area of concern

## OU 2

For risk assessment purposes, there are five source areas for OU 2

The COC TM will be revised. Comments for this TM were received from the EPA and CDH in April 1994.

Data will be reaggregated for the groundwater units based on comments received from the agencies

Validated data will be aggregated and used to revise the COC TM and for the risk assessment. This is preferred since much of the data will be reaggregated for groundwater as above, and using validated data will allow review and approval of the final COCs prior to issuing the Final Phase II RFI/RI Report.

Groundwater modeling will be performed on an OU-wide basis and not by source area

Air modeling will be done for each of the source areas and/or areas of concern

One volatile organic compound migration from groundwater to indoor air will be modeled

COCs will be determined using the Gilbert background comparison as the validated data set is being used and COCs are being rerun. This is a result of agency comments on the COC TM.

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## OU<sub>3</sub>

There will be no concurrent DOE/EG&G reviews

There will be concurrent DOE RFFO and Headquarters reviews

A maximum of five source areas will be evaluated. The risk assessment calculations based on the supplied data aggregation approach will generally coincide with the four IHSS designations and the Remedy Acreage.

There will be no added groundwater issues to address in the Phase I Remedial Feasibility Investigation/Remedial Investigation (RFI/RI) Report

The Exposure Scenario TM (TM-2) will not require revision and resubmittal. Comments will be addressed with a responsiveness summary

The previously negotiated duration of eight months between the draft and final RFI/RI Report will be used.

The analysis of OU 3 data will provide sufficient nature and extent evaluation to identify COCs prior to completion of the COC TM

Modeling will be done after the COCs are determined

#### OU 5

A maximum of fifteen source areas will be evaluated

The Draft Exposure Scenario TM has been submitted and reviewed by the regulators and will not require a major revision

The Draft Phase II field data will be incorporated into the Final Phase I RFI/RI Report. The finalized data will be submitted later as another revision of the Final Report or as an appendix

Analytical results from additional sampling under TM15 will not deviate substantially from existing data used in the risk assessment

#### OU 6

A maximum of fifteen source areas will be evaluated

Jessie M Roberson July 1, 1994 94-RF-07089 Page 4

The Draft Exposure Scenario TM has been submitted and reviewed by the regulators and will not require a major revision

S.G. Silger, Director Environmental Restoration Program Division

EG&G Rocky Flats, Inc

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Ong and 1 cc - J M Roberson Attachments As Stated (4)

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Part 4 of 4  Pate Revision Decked Reserved	IREHIABILITY/FEASIBILITY STUDY	1994 1995 1996

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ACTIVITY   ACTIVITY   EARLY   EARLY   ORIG   1995		10	30JUN97	17JUN97	NRDA TRUSTEES REVIEW FINAL PROPOSED PLAN EA	12060C1740
ACTIVITY		10	30JUN97	17JUN97	EPA/CDH REVIEW FINAL PROPOSED PLAN EA	1206001730
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LATS, INC ND, EAST TH NAR CHART	25F848	18FEB98	4FE898	21 JAN98	160EC97	13N0V97	EARLY FINISH
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orthod Activity on the Company of th	RELEASE RESPONSIVENESS SUMMARY TO PUBLIC	ROD/CAD SIGNED		EPA/COH REVIEW & APPROVE FINAL CAD/ROD	IAG - SUBMIT FINAL CAD/ROD	DOCUMENT PROCESSING & TRANSMITTAL	INCORPORATE COMMENTS & FINALIZE CAD/ROD	DOE-HQ/NEPA REVIEW FINAL CAD/ROD	DOE-RFO REVIEW FINAL CAD/ROD	DOCUMENT PROCESSING & TRANSMITTAL	INCORPORATE COMMENTS & FINALIZE CAD/ROD	NRDA TRUSTEES REVIEW DRAFT CAD/ROD	EPA/COH REVIEW DRAFT CAD/ROD	IAG - SUBMIT DRAFT CAD/ROD		INCORPORATE COMMENTS & FINALIZE DRAFT CAD/ROD	DOE-HQ/NEPA REVIEW DRAFT CAD/ROD	DOE-RFO REVIEW DRAFT CAD/ROD	DOCUMENT PROCESSING & TRANSHITTAL	PREPARE PRELIMINARY DRAFT CAD/ROD		ACTIVITY  1D DESCRIPTION
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		9DEC94	1 90EC94	TM #5 Comments Meeting	CA06056060
	G	15DEC94	10 2DEC94	Respond to Comments	C1-04056055 F
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		1980694	5 15AUG94	Internal Revision	CM0602015
		1200694	5 8AUG94	Internal Review Process	CANG056010
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	<b></b>	24MAR95		THIS REVIEW MEETING	CN06053235 1
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		17FEB95		DOE REVIEW	CH06053215 [
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		20JAN95		ECCG REVIEW	CHU\$023502
	-	6JAN95		INTERNAL REVISION	
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		96 JNF51	24 JUN96	15	}	Revision	CD05090035
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		20MAR96	7119896	10	Review Process		0100400413
		6MAR96	25JA1196	30	Incorporate Comments & Finalize HHRA/EE/RI		57.3060207.1
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	<del>5</del> 5	_	6FEB95	28N0V94	<del>5</del>	45	NON-RADS (non-validated)	1	1220700540
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- ·	~		21N0V94	1800194	25	25	GW SAMPLING AND SHIPPING		1220701500
	17	_	3100194	20SEP94	30	30	SURFACE SOIL SAMPLING PACKAGING SHIPPING		1220700490
	<u> </u>		23N0V94	20SEP94	47	47	BORINGS PACKAGING SHIPPING		1220700480
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	17	_	2400194	20SEP94	<u>ک</u>	25	SURFACE SOIL SAMPLING	220700150 SUR	12207
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<b>-</b>	0		195EP94	2290694	20	20	DEVELOP INCP OR SOP S	1220700400 DEV	12207
	6 j	_	25EP94	2290694	10	10	REVIEN \REVISED HASP		12207
	5	_	2600094	2290694	5	5	DATA REVIEW (SOP TRAINING)		1550
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<b>1</b>		228	14,101.94	10 2MAY94A	30	CHAPTER 4. NATURE	1220701170
		226	18,0194	12 1APR94A	60	CHAPTER 3, PHYSICAL	1220701160
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- (22)		100	29JUN94	23MAY94A	7 9	27	Sample Management	1225510260 Samp
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	1_		23MAY94A	6HAY94A	0 0	20	Readiness Review	1225510245 Reac
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<b>~</b>		-	14SEP94	155EP94	0	CREEN 0	UΦ	1225510448
-		=	145EP94	85EP94	5	5	PREPARE LETTER REPORT	12255111447
9			75EP94	2490694	10	ERMINATION 10	APPLI COH COUSERVATIVE SCREEN/IHSS DETERMINATION	
		=	2390694	2390694	_	-	INCOPPORATE PROGRAMMATIC PRG 5	
		=	22AUG94	2290694	-	AREA MAPS 1	HEETING HIAGENCIES PRESENTING SOURCE AREA MAPS	5-16114
8		=	1960694	890694	10	10	GENERATE SOURCE AREA MAPS	
	<b></b> 1	14	SAUG94	190694	5	5	IDENTIFY COH SOURCE APEAS	1225510442
<b>2</b>		14	14SEP94	190694	ಜ	, 32	CDII CONSERVATIVE SCREEN	12.22.0+11
<b>'</b>		0	29JUL94	17JUN94	30	30	APPY DATA AGGREGATION METHODOLOGY	122510440
			10JUN94A	24MAY94A	0	E 10	IDENTIFICATION OF POTENTIAL COCS/N &	1552210150
			23MAY94A	17HAY94A	0	5	COIL TOY SCREEIIS	
			6MAY94A	19APR94A	0	20	BACKGROUND COMPARISON	
	<b></b>		18APR94A	28M9R94A	0	15	DATA CLEAN UP	12,5510390
		156	8JUL 94	1MAR94A	5	91	HUMAN HEALTH RISK DEVELOPMENT	1
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		88	12JAN95	<b>1</b> 6A0118	40	40	EC/PEPORT PREPARATION	1557210.50
		<b>4</b> 676	12JAN95	2900694	9	90	EENHRA INTERGRATION	1225511-550
		88	7N0V94	16AON2			RISK CHARACTERIZATION MEETING	1, 2',510348
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		88	25JUL94	25JUL94	1	_	PROBLEM FORTULATION MEETING	1285510336
		86	22JUL9 <del>4</del>	13JUN94A	25	30	PROBLEM FORMULATION	1, 25, 10774
	,	<b>a</b>	65EP94	19APR94A	28	06	EE/DATA EVALUATION	12.5510330
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	<b></b>	72	1120694		-	1225510550 AGENCY MEETING - DRAFT FINAL COC TM
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<b>⇔</b> †	- <u>.</u>	12	13JUL94			1225510520 SUBILI DRAFT COC IN TO EG&G/DOE
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	1	0	40CT94		_	1225510490 FIHAL EPA/CDH REVIEW OF POSITION PAPER
<b>-</b> ,	1	0	205EP94	5 145EP94	S	1225510480 PREPARE FOLLOW-UP LETTER DOCUMENTING AGREEMENT
		0	65EP94	1 6SEPq+	-	1225510470 MEETING NIVAGENCIES( PRES EXP AREAS & PLACE GRID)
		0	135EP94	5 7SEP94	5	1235510160 IDENTIFY MAX EXP AREAS
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